

## **REMARKS**

This application has been reviewed in light of the Office Action mailed September 9, 2008. Reconsideration of this application in view of the below remarks is respectfully requested. Claims 1 – 11 are pending in the application with Claim 1 being in independent form.

In the present amendment, Claim 1 is amended to recite "...the first and second groups of I/O cells being disposed directly under the semiconductor member..." Support for the recited features of Claim 1 is shown in FIG. 4 and 7, for example, and the relevant portions of the specification. Therefore, no new subject matter is introduced into the disclosure by way of the present amendment.

### **I. Objection to the Drawings**

FIG. 4 and FIG. 7 are objected because the enlargements shown in the figures do not correspond to the area indicating as having been enlarged. Specifically, the ball electrodes shown in the enlargements do not match the number of ball electrodes shown in the dotted squares.

In response, replacement drawing sheets 4 and 7 are submitted containing amended FIG. 4 and 7, respectively. FIG. 4 and 7 are amended to provide agreement between the number of ball electrodes shown in the enlargement and the number of ball electrodes shown in the dotted squares. Accordingly, Applicant respectfully requests withdrawal of the objection to the drawings.

### **II. Rejection of Claims 1, 2 and 4 – 11 Under 35 U.S.C. § 102(e)**

Claims 1, 2 and 4 – 11 are rejected under 35 U.S.C. § 102(e) as allegedly anticipated by U.S. Patent No. 6,111,756 issued to Moresco.

The assembly disclosed in Moresco is essentially a modular chip testing board on which chip packages can be mounted for testing. In contrast, the present invention as claimed is a

semiconductor device (i.e., a chip package) not a chip testing board on which a chip package may be mounted.

The present Office Action alleges that that the semiconductor member in the present application corresponds to IC chip 5 (See: FIG. 2 in Moresco), the mounting member corresponds to universal chip carrier 20, the first group of I/O cells corresponds to pad array 24, and the second group of I/O cells corresponds to pad array 22.

However, as recited in amended Claim 1, the interconnect pads forming the first and second group of I/O cells are disposed directly under the semiconductor member, allowing for direct connection of the electrode terminals of the semiconductor member to the interconnect pads of the first and second group of I/O cells. In contrast, the pad array 24 in Moresco, alleged to be anticipatory of applicant's first group of I/O cells, is not disposed directly under the semiconductor member (i.e., IC chip 5) thus the first group of I/O cells disclosed in Moresco cannot be mechanically connected to the electrode terminals of the semiconductor member.

Therefore, as demonstrated above, because Moresco does not disclose each and every element recited in the present claims, Applicant respectfully submits that the rejection has been obviated. Accordingly, Applicant respectfully requests withdrawal of the rejection with respect to Claims 1, 2 and 4 – 11 under 35 U.S.C. § 102(e).

### **III. Rejection of Claim 3 Under 35 U.S.C. § 103(a)**

Claim 3 is rejected under 35 U.S.C. § 103(a) over Moresco in view of Applicant's admitted prior art (AAPA).

Claim 3 depends from independent Claim 1 and thus includes all the limitations recited in that independent claim. As stated above, Moresco fails to disclose, or even suggest, all the

features of amended Claim 1. In addition, AAPA fails to overcome the deficiencies identified in Moresco.

Moreover, the assembly disclosed in Moresco is test equipment used to test attached chips with high-speed signals. (See: col. 3, lines 25 – 38). Given that the disclosed assembly is used for testing chips, ball electrodes would not be used to replace the plurality of interior pads by one of ordinary skill in the art since ball electrodes result in permanent attachment of the chip. Replacing the interior pads with ball electrodes would, thus, render Moresco inoperable for its intended purpose. Consequently, the combination of Moresco and ball electrodes is improper and non-obvious.

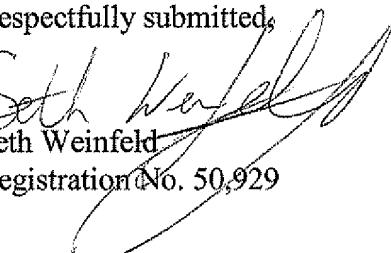
Therefore, for at least the reasons presented above, Claim 3 is believed to be allowable over the cited prior art references. Accordingly, Applicant respectfully requests withdrawal of the rejection with respect to Claim 3 under 35 U.S.C. § 103(a) over Moresco in view of AAPA.

**CONCLUSIONS**

In view of the foregoing amendments and remarks, it is respectfully submitted that all claims presently pending in the application, namely, Claims 1 – 11 are believed to be in condition for allowance and patentably distinguishable over the art of record.

If the Examiner should have any questions concerning this communication or feels that an interview would be helpful, the Examiner is requested to call Applicant's undersigned attorney at the number indicated below.

Respectfully submitted,

  
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